

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

CASE NO.:23-24670-CIV-LENARD/DAMIAN

SHANTEE REESE,

Plaintiff,

v.

ALORICA, INC.,  
a Foreign Profit Corporation,

Defendant.

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**DEFENDANT’S REMOVAL STATUS REPORT**

Defendant, Alorica, Inc. (“Defendant”), by and through its undersigned counsel, and pursuant to the Court’s Order of December 13, 2023 [DE 6], hereby files its Removal Status Report. Defendant provides supporting information as follows:

- 1. A plain statement of the nature of the claim and any counterclaim, cross-claim or third-party claim made in state or federal court, including the amount of damages claimed and any other relief sought;**

Plaintiff filed her Complaint on November 2, 2023 in the Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida, *Reese v. Alorica, Inc.*, Circuit Court Case No: 2023-025883-CA-01. This Complaint was served on Defendant on November 9, 2023.

Plaintiff’s six (6) count Complaint alleges violations of the Florida Civil Rights Act of 1992, §760.01, *Florida Statutes, et seq.* (“FCRA”), and the Miami-Dade County Human Rights Ordinance, § 12-26, § 11A-26, Code of Miami-Dade County, *et seq.* (“MDHRO”).

Plaintiff’s Complaint makes no reference to any specific damages calculations other than referencing the Florida circuit court monetary jurisdictional threshold of damages exceeding \$50,000, excluding attorneys’ fees or costs. *Complaint*, ¶10. With respect to damages and relief, each count of Plaintiff’s Complaint seeks “lost economic damages, lost wages, back pay, interest,

front pay, the value and/or economic impact of lost benefits, and compensatory damages.” *See Complaint ¶¶ 75, 86, 99, 110, 121, 134.* The Complaint also seeks punitive damages. *See Complaint, generally.*

Defendants have no counterclaims, cross-claims, or third-party claims at this time.

**2. A plain statement of the grounds for removal.**

Defendants have removed this action to the United States District Court for the Southern District of Florida pursuant to 28 U.S.C. § 1332(a), wherein “[t]he district courts shall have original jurisdiction of all civil actions where the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and is between (1) Citizens of different states.” As established in detail in Defendant’s Notice of Removal [DE 1], there is complete diversity of citizenship between the parties, and the amount in controversy exceeds the threshold amount of \$75,000.

There are no third-party claims at this time.

**3. A plain statement of the citizenship of all Parties to the action.**

Plaintiff is a citizen of the State of Florida and Defendant is a Citizen of the States of Delaware and California. *See Notice of and Petition for Removal*, [DE 1, p.3].

**4. A list of all Parties to the action.**

The parties to this action are:

- a. *Plaintiff* – Shante Reese
- b. *Defendant* – Alorica, Inc.

**5-6. As to the Defendant and timeliness of removal:**

Plaintiff effectuated service of the Complaint on Defendant on November 9, 2023. The lone Defendant, Alorica, Inc., filed its Notice of Removal on December 11, 2023, which is within 30 days after Defendant’s receipt of the pleading setting forth the claim for relief upon which this action is based, as required by 28 U.S.C. § 1446(b)(1).

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7. **A list of any motions pending at the time of removal.**

None.

Dated: December 28, 2023

Respectfully submitted,

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/s/ Dion Cassata

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*Counsel for Defendant*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on December 28, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the below Service List via transmission of Notice of Electronic Filing generated by CM/ECF and Electronic Mail.

s/ Dion J. Cassata

Dion J. Cassata, Esq.

**SERVICE LIST**

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